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March 18, 1994

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William F. Caton  
Acting Secretary  
Office of the Secretary  
CC Docket No. 92-297  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

**Education Representative Nomination and Comments on Proposed  
Negotiated Rulemaking Advisory Committee for 27.5-29.5 GHz Band  
Local Multipoint Distribution Service Technical Rules (CC Docket  
No. 92-297)**

Dear Mr. Caton:

The Regents of the University of California (UC) operates nine campuses including five medical centers and numerous professional schools which provide undergraduate, graduate and professional instruction, as well as research and public service throughout the state of California. Future technological innovations will provide an invaluable resource which UC will need to utilize to be able to continue to effectively and efficiently provide these educational services. Therefore, I submit this original and nine copies of the University's comments on the Commission's proposal to form a Negotiated Rulemaking Committee to develop technical rules for the proposed 27.5 to 29.5 GHz Local Multipoint Distribution Service (LMDS) and nominate Ms. Willi Bokenkamp to represent educators on this committee.

**Establishing a Federal Advisory Committee**

We believe that, as long as educators and public telecommunications entities are adequately represented in a negotiated rulemaking committee, the Commission may be able to develop in a shorter time period a more comprehensive and responsive set of rules for shared use of the 27.5 to 29.5 GHz band than is possible in the normal rulemaking process.

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#### Committee Member Nomination

The University of California is an institution of higher education which is a potential LMDS licensee and which submitted comments March 15, 1993 in the original LMDS notice of proposed rulemaking. We nominate Ms. Willi Bokenkamp, who is a Senior Communications Analyst in the UC Office of the President, to represent educators on the proposed Negotiated Rulemaking Committee. Ms. Bokenkamp advises the nine UC campuses on educational media and distance learning activities as well as federal and state communications regulations and policies. She is a member of the UC Universitywide Task Force on Intercampus Programs and Distance Learning, the Board of Directors of the Alliance for Distance Education in California (ADEC), and the WASC (Western Association of Schools and Colleges) Distance Learning Committee. She represents UC on several area ITFS operators' consortia and participated in the December 1992 Forum on Defining the Federal Role in Educational Technology which was hosted by the Far West Laboratory for Educational Research and Development. Letters supporting Ms. Bokenkamp's representation of educators on this advisory committee are also being submitted by ADEC, the Western Cooperative for Educational Telecommunications and other educational institutions. Ms. Bokenkamp will actively participate in good faith in the development of rules for the 27.5 to 29.5 GHz radiofrequency band. We believe that Ms. Bokenkamp will represent the interest of all educators, not just higher education, because of her experience in developing cooperative consortia and committees (which include elementary and secondary education systems, as well as colleges and universities, both public and private) to facilitate use of educational technology to expand and improve provision of education, research and public service activities and her longstanding involvement in developing comments representing the educators' perspective in response to the Commission's proposed rulemakings and inquiries.

#### Meetings and Compensation

Because a number of the interested parties identified in the LMDS request for comments are not located in the Washington, D.C. area, we believe that it would be beneficial to utilize videoconferencing and/or audioconferencing for most of the committee's meetings or to conduct a substantial number of the committee meetings in other parts of the country, such as in Texas and California, where a number of the affected parties are

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located. The University of California is willing to provide a meeting room for this committee's meetings at its Riverside campus in southern California or at UC facilities in the San Francisco Bay Area. Also, UC is willing to provide use of its videoconference rooms in Davis, the San Francisco Bay Area, Los Angeles, Riverside, San Diego and Santa Barbara to enable west coast committee members to participate in committee meetings conducted via videoconference.

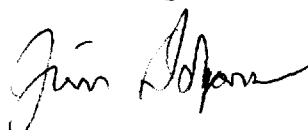
**Balanced Representation of Interests**

In light of the expense of participating in the proposed negotiated rulemaking process, we believe it would be appropriate for the Commission to allow the committee members' companies and institutions to contribute the use of their meeting facilities and videoconference rooms in order to facilitate adequate representation of educational and public telecommunications interests in this process.

**Conclusion**

As a potential LMDS licensee, UC supports the use of a negotiated rulemaking process if there is adequate representation of educators' and other public telecommunications users' needs. To assure fuller educational participation, we nominate Ms. Willi Bokenkamp to be a member of this proposed Federal Advisory Committee. If there is additional information on educators' participation in the proposed negotiated rulemaking process which we can provide you, please contact Ms. Willi Bokenkamp of my staff at (510) 987-0373.

Sincerely,



Jim Dolgonas  
Acting Associate  
Vice President  
Information Systems and  
Administrative Services

Enclosure: 9 copies of this Comment and Nomination for FCC  
distribution

cc: Manager McDonald